

**REDACTED**  
**EXHIBIT 2**

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF FLORIDA**

UNITED STATES OF AMERICA.

v.

THEODORE FARNSWORTH and J.  
MITCHELL LOWE,

Defendants.

Case No. 22-CR-20521-RNS  
**FILED UNDER SEAL**

**DECLARATION OF THEODORE J. FARNSWORTH IN  
SUPPORT OF HIS OPPOSITION TO THE  
GOVERNMENT'S MOTION TO REVOKE PRE-TRIAL RELEASE**

I, THEODORE J. FARNSWORTH, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am over the age of 18 and competent to testify in this matter.
2. I have personal knowledge about the matters stated in this Declaration.
3. I submit this Declaration in support of the contemporaneously filed opposition to the Government's motion to revoke Mr. Farnsworth's pre-trial release and to detain Mr. Farnsworth pending his trial next September.
4. I submit this Declaration to place before the Court certain information relevant to events referenced in the Government's motion and the opposition.
5. [REDACTED] is a former boyfriend of mine. While we were together, [REDACTED] worked part-time for one of my business ventures and also generally completed tasks and errands at my request. When we dated, I would wire [REDACTED] money, including to cover common expenses.
6. While [REDACTED] and I were in a long-term relationship, [REDACTED] would sometimes research, negotiate prices, and pick up cars throughout the country on my behalf. One of those cars was a Cadillac Escalade I purchased from Jim Ellis Volkswagen in Georgia. I later learned from a repair shop from which [REDACTED] retrieved the vehicle that, unbeknownst to me, [REDACTED] had registered and titled

the vehicle solely in his name. I always intended for the Escalade to be my possession, and I hired lawyers in Syracuse, New York to examine possible claims against [REDACTED] for having stolen the vehicle.

7. I also entered into a relationship with [REDACTED] in May of this year, and I acted as a financial benefactor for him. I originally met him in 2022. I also plan to start a jewelry line with [REDACTED]. Additionally, [REDACTED] recently attended my mother's funeral with me.

8. On July 11, 2023, I spoke with Probation Officer Michael Christopher when he requested to speak with me. In that conversation, Officer Christopher asked why I had asked for permission to go to Tampa Bay, Florida for emergency dental work when I had not asked his permission to travel to Miami. I expressed that based on my understanding of the bail conditions imposed by the Court, because Tampa was not in the Southern District of Florida, I needed to request permission to travel there, but I did not understand that I needed to request permission to travel to Miami.

9. When Officer Christopher asked me about law enforcement contact relating to [REDACTED] to the best of my recollection, I relayed that I did not think I needed to contact him when I was reporting that I was the victim of a crime, but I would have told him if I understood my conditions of release required reporting such contact.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. This Declaration was executed on this \_\_\_\_\_ day of August, 2023 in Miami, Florida.

/s/

\_\_\_\_\_  
Theodore J. Farnsworth